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Lyle Robert Evans
Technical Consultant
1391 North Road
Green Bay, Wisconsin 54313
(414) 494-2626

February 14, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

SIGNED ORIGINAL

RECEIVED

FEB 16 1994

BY HAND

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Petition for Rule Making
Menominee and Iron Mountain,
Michigan and Wittenberg,
Wisconsin.

Dear Secretary Caton:

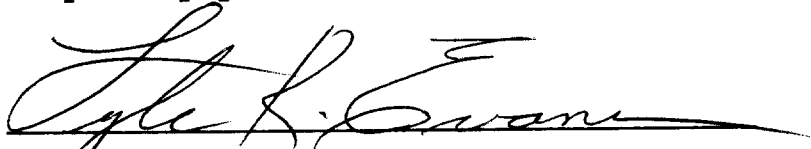
Transmitted herewith on behalf of my client, Douglas A. Maszka d/b/a Tri-Cities Television Company, is a signed original and five copies of a Petition for Rule Making and related Attachment and Engineering Statement.

This Petition requests amendment of 47 Code of Federal Regulations, §73.606(b), Table of Allotments, Television Broadcast Stations, to allot UHF Television Channel 31 to the City of Menominee, Michigan, as that community's first local television transmission service, and UHF Television Channel 17 to the Village of Wittenberg, Wisconsin, as that community's first local broadcast service.

A filing fee is not required with this submission.

Kindly direct this correspondence for proper processing.

Very truly yours,



Lyle R Evans,
Technical Consultant to:
Tri-Cities Television Company

LRE/hs

Enc: Petition for Rule Making, signed original and five
copies

CC: Douglas A. Maszka

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SIGNED ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

RECEIVED

FEB 16 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

IN THE MATTER OF:) MM DOCKET NO:
AMENDMENT OF SECTION 73.606(B),) RM
TABLE OF ALLOTMENTS,)
TELEVISION BROADCAST STATIONS.)
(MENOMINEE AND IRON MOUNTAIN,)
MICHIGAN AND WITTENBERG,)
WISCONSIN.)

TO: CHIEF, ALLOCATIONS BRANCH,
POLICY AND RULES DIVISION,
MASS MEDIA BUREAU

PETITION FOR RULE MAKING

Douglas A. Maszka, d/b/a Tri-Cities Television Company, hereby Petitions the Federal Communications Commission in Washington, D.C., to amend the Television Table of Allotments, Section 73.606(b) of the Commission's Rules and Regulations in the following manner:

<u>Community:</u>	<u>Existing:</u>	<u>Proposed:</u>
Iron Mountain, MI	8-, *17+	8-, *25
Menominee, MI	None	31
Wittenberg, WI	None	17

In support of this PETITION FOR RULE MAKING to allot UHF Television Channel 31 to Menominee, Michigan and UHF Television Channel 17 to Wittenberg, Wisconsin Tri-Cities Television Company, the Petitioner, respectfully

submits the Engineering Statement prepared by Lyle R. Evans, Technical Consultant, attached hereto as Appendix 1.

Inasmuch as Menominee, Michigan and vicinity shall be provided a first local television transmission service and Wittenberg, Wisconsin and vicinity shall be provided a first local broadcast service and first local television transmission service, significantly contributing to television program diversity available and providing local residents a means of visual self expression, the Petitioner, Tri-Cities Television Company, concludes its Proposed Rule Making in the public interest.

Tri-Cities Television Company requests allotment of Channel 31 to Menominee, Michigan, because it owns expensive channel dependent equipment necessary to place a Television Channel 31 operation at Menominee "On Air".

In order to allot Channel 31 to Menominee, Michigan and Channel 17 to Wittenberg, Wisconsin, it is mandatory UHF Television Channel 25 be substituted for vacant allotment Channel *17+ at Iron Mountain, Michigan. No other channel substitutions are required.

Menominee, Michigan, population 9,398 persons (per the 1990 Census), is an incorporated city. The allotment of Television Channel 31 to the City of Menominee, Michigan, as proposed, is in full accord with all Commission Rules, Regulations and Allotment policy.

Wittenberg, Wisconsin, population 1,145 persons (per the 1990 Census), is an incorporated village.

Attachment "A" to this Petition, a Village of Wittenberg Community Profile, sets forth demographic information regarding Wittenberg. This information proves Wittenberg meets all Commission criteria required to define a community for allotment purposes. The allotment of Channel 17 to the Village of Wittenberg, Wisconsin, as proposed, is in full accord with all Commission Rules, Regulations and Allotment policy.

If the Commission goes forward to amend 47 Code of Federal Regulations, §73.606(b), to allot Television Channel 31 to Menominee, Michigan, as petitioned; Tri-Cities Television Company shall immediately file an Application For Construction Permit For Commercial Broadcast Station (FCC Form 301), to activate Channel 31, as allotted at Menominee.

Upon grant of such a Form 301 Application by the Commission, Tri-Cities Television Company shall promptly construct and subsequently license the permitted facility.

If the Commission goes forward to amend 47 Code of Federal Regulations, §73.606(b), to allot Television Channel 17 to Wittenberg, Wisconsin, as petitioned; Tri-Cities Television Company shall immediately file an Application For Construction Permit For Commercial Broadcast Station (FCC Form 301), to activate Channel 17, as allotted at Wittenberg.

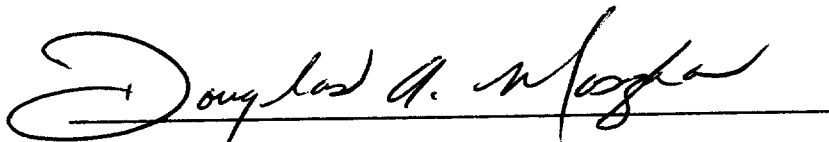
Upon grant of such a Form 301 Application by the Commission, Tri-Cities Television Company shall promptly construct and subsequently license the permitted facility.

In accord with 47 Code of Federal Regulations, §1.52; I, Douglas A. Maszka, hereby certify I have read this entire document, that to the best of my knowledge, information and belief it is true and correct, that there is good ground to support it and that it is not interposed for delay.

Respectfully submitted,

TRI-CITIES TELEVISION COMPANY

February 10, 1994

A handwritten signature in cursive script, reading "Douglas A. Maszka", written over a horizontal line.

Douglas A. Maszka,
Sole Proprietor

Douglas A. Maszka d/b/a
Tri-Cities Television Company
600 Vroman Street
Green Bay, Wisconsin 54303
(414) 497-3136

PETITION FOR RULE MAKING; CONCLUDED

ATTACHMENT A

VILLAGE OF WITTENBERG COMMUNITY PROFILE

Wittenberg, Wisconsin (population 1,145), in Shawano County (population 27,177), per the 1990 Census, is located in northeastern, Wisconsin approximately 97.75 kilometers (60.75 miles) west of Green Bay, Wisconsin.

Wittenberg, an incorporated village is governed by a Village Board of Trustees elected by residents residing in two voting wards. A Village President is elected at large.

Wittenberg municipal offices are located in a modern village hall. Municipal services are administered by the Village President and administrative staff including: a Clerk, Treasurer, Building Inspector, Assessor, Director of Public Works and others.

Wittenberg operates its own water and sewer utility consisting of four water wells and a state-of-the-art filtration plant and distribution system. The sewage disposal system includes an ultra-modern, environmentally correct "Seepage Cell" treatment plant.

Wittenberg's well equipped fire department, including a fleet of six assorted fire fighting vehicles, is housed in a modern fire station.

The Village of Wittenberg Public Library contains thousands of printed volumes, audio and video recordings, photographs and other media.

The Wittenberg Community Center houses the village park and recreation department offering full-time, year round, recreation programs of varied activities for all interests.

The village maintains two large parks, both with playgrounds and shelters, one with a fish pond, band shell and illuminated hardball and softball fields and tennis courts.

Shawano County, State of Wisconsin and Federal Government services are provided from offices within Wittenberg.

The Wisconsin Department of Transportation operates a drivers license examining and motor vehicle record center in Wittenberg.

An office of the United States Government Social Security Administration is in Wittenberg.

Wittenberg is home of the Wittenberg-Birnamwood Joint School District which operates four "K-6'th grade" elementary schools, a middle school and high school with a staff of 217 persons and combined enrollment of 1,523 students.

North Central Technical college has a campus within Wittenberg offering associated and baccalaureate degrees in many disciplines. The Wittenberg campus specializes in computer science, information processing and

accounting. The college operates an Instructional Television Field Service (I.T.F.S.) station with studio and antenna/tower in Wittenberg.

Wittenberg's outstanding highway access makes it a prime retail and service center for local residents and persons residing in communities and on farms in the general vicinity.

One hundred plus retail and service business are located in Wittenberg's downtown area or along highways 29 and 45 that transgress the community.

The Winnebago Tribe of American Indians constructed a large convenience mart and gift shop in Wittenberg.

Financial services within Wittenberg include a full-service bank, The Associated Bank, a farm credit office and two local insurance firms offering financial brokerage services.

The Wittenberg Chamber of Commerce boasts a large membership. This active organization vigorously promotes the Village of Wittenberg and vicinity economic and retail growth. The Wittenberg Industrial Development Corporation is developing a major industrial park.

Wittenberg industry includes Nueske Hill-Crest Farm Meats, a worldwide distributor of meat products. Associated Milk Producers, Incorporated (A.M.P.I.) is a

major dairy food processor serving thousands of institutional, wholesale and retail distributors throughout the midwest. Ort Lumber Manufacturing Company produces shipping pallets. Glovers Manufacturing Company is a leading producer of metal component parts for farm implement and construction machinery manufacturers.

Several major transportation companies have offices and truck terminals in Wittenberg. The village is served by inter-city bus transportation lines, United Parcel Service and various air-freight companies

Wittenberg has its own telephone company and cable television system with telephone switching and business offices and cable "head-end" facilities and offices located in the village.

The Wittenberg Press, a weekly local newspaper, has offices, and is published in Wittenberg. An area shopper-newspaper also has offices in Wittenberg.

Wittenberg is the center of area medical service. Medical, dental, visual, chiropractic and veterinary medicine clinics are located in Wittenberg.

The Homme Home of Wittenberg is a short-and-extended-care medical facility with 24 hour emergency ambulance service.

This "Homme" facility offers family services to area residents and has a residence and treatment center for

troubled youth and young adults.

Wittenberg has two Lutheran, a Methodist, Catholic and Community Bible Church. Other denominations worship at locations within the village.

Wittenberg has many civic organizations including the Lions and Lionesses, an American Legion Post with auxiliary, an active Parent-Teacher Organization, Girl Scout, Boy Scout and Explorer Troups and other groups.

The Wittenberg Historical Society operates a public museum to preserve Wittenberg's rich heritage.

The Wittenberg Fish and Game Club promotes fish and game management and offers instruction in fishing and hunting safety.

The Wittenberg Trailblazers Snowmobile Club maintains many miles of snowmobile trails for residents and visitors. The club recently purchased a \$35,000 mechanical "groomer" to maintain trails in top condition.

Annual festivals and celebrations attract thousands of visitors to Wittenberg. A three-day homecoming celebration is held each summer featuring a carnival, music, other entertainment and plenty of food and drink.

The Village of Wittenberg, Wisconsin, is a diverse, vibrant, economically stable, rapidly growing community of proud, industrious residents fully deserving of their own full-power television station.

Sources of data presented in Attachment "A"
include:

- 1.) Ms. Reberta Haupt,
Village of Wittenberg Clerk
P.O. Box 331
Wittenberg, Wisconsin 54498
(715) 253-6063

- 2.) Ms. Darla Garton,
Immediate Past President
Wittenberg Chamber of Commerce
& Associated Bank
P.O. Box 289
Wittenberg, Wisconsin 54499
(715) 253-2127

ATTACHMENT A; CONCLUDED

APPENDIX 1

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

ENGINEERING STATEMENT

IN THE MATTER OF:

) MM DOCKET NO:

AMENDMENT OF SECTION 73.606(B),)
TABLE OF ALLOTMENTS,)
TELEVISION BROADCAST STATIONS,)
(MENOMINEE AND IRON MOUNTAIN,)
MICHIGAN AND WITTENBERG,)
WISCONSIN.)

RM

TO: CHIEF, ALLOCATIONS BRANCH
POLICY AND RULES DIVISION
MASS MEDIA BUREAU

PREPARED FOR:

TRI-CITIES TELEVISION COMPANY

FEBRUARY 03, 1994

PREPARED BY:

LYLE ROBERT EVANS
TECHNICAL CONSULTANT
1391 NORTH ROAD
GREEN BAY, WISCONSIN 54313

(414) 494-2626

PETITIONER: Tri-Cities Television Co. TABLE OF CONTENTS
TV Channel 31; Menominee, MI
TV Channel 17; Wittenberg, WI Prepared 02/03/94

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Coordinates

TABLE OF CONTENTS; CONCLUDED

STATE OF WISCONSIN)

COUNTY OF BROWN)

CITY OF GREEN BAY)


LYLE ROBERT EVANS, BEING FIRST DULY SWORN STATES:

THAT HE IS A ELECTRONIC COMMUNICATIONS TECHNICAL CONSULTANT
WITH OFFICES AT 1391 NORTH ROAD, GREEN BAY, WISCONSIN,
54313.

THAT HIS QUALIFICATIONS AS AN EXPERT IN COMMUNICATIONS
ENGINEERING ARE A MATTER OF RECORD WITH THE FEDERAL
COMMUNICATIONS COMMISSION IN WASHINGTON, D.C.

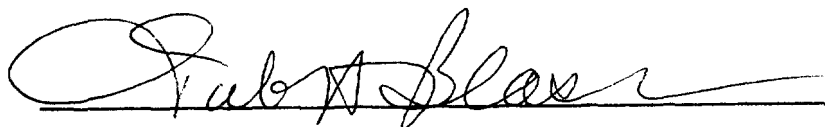
THAT HE HAS PREPARED NUMEROUS AM, FM, MICROWAVE RADIO,
TELEVISION, TRANSLATOR AND OTHER APPLICATIONS WHICH HAVE
BEEN PROCESSED TO GRANT BY THE FEDERAL COMMUNICATIONS
COMMISSION.

THAT THE FOREGOING TECHNICAL REPORT WAS PREPARED BY HIM, AND
ALL CALCULATIONS AND/OR MEASUREMENTS AND EXHIBITS IN THE
ACCOMPANYING REPORT WERE MADE BY HIM PERSONALLY OR UNDER HIS
DIRECTION, AND THAT ALL FACTS CONTAINED HEREIN ARE TRUE OF
HIS PERSONAL KNOWLEDGE OR BELIEF, AND ON SUCH STATEMENTS
MADE ON BELIEF, THEY ARE BELIEVED TO BE TRUE AND CORRECT.



LYLE ROBERT EVANS, AFFIANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS 3RD, DAY OF
FEBRUARY, 1994.



JULIE A. BLASER, NOTARY PUBLIC

DATE OF COMMISSION EXPIRATION: 6-22-97

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

IN THE MATTER OF:) MM DOCKET NO:
AMENDMENT OF SECTION 73.606(B),) RM
TABLE OF ALLOTMENTS,)
TELEVISION BROADCAST STATIONS.)
(MENOMINEE AND IRON MOUNTAIN,)
MICHIGAN AND WITTENBERG,)
WISCONSIN.)
TO: CHIEF, ALLOCATIONS BRANCH,
POLICY AND RULES DIVISION,
MASS MEDIA BUREAU

ENGINEERING STATEMENT

This Engineering Statement concerns the above captioned Petition For Rule Making, to which this Statement is Appendix 1.

Tri-Cities Television Company, the Petitioner, retained the services of Lyle Robert Evans, technical consultant, to conduct engineering studies and prepare necessary Statements and Attachments to support the Petition For Rule Making of Tri-Cities Television Company to amend 47 Code of Federal Regulations, §73.606(b), Table of Allotments, Television Broadcast Stations, to allot UHF Television Channel 31 to the City of Menominee, Michigan as that community's first television transmission service, and allot UHF Television Channel 17 to the Village of Wittenberg, Wisconsin as that community's first television

transmission service and first broadcast service.

The City of Menominee, Michigan geographic Reference Coordinates, specified in the National Atlas of the United States of America, published by the United States Department of the Interior Geological Survey, are:
45°-06'-24" North Latitude, 87°-36'-48" West Longitude.

Allotment of Television Channel 31 to Menominee, Michigan falls under restrictions defined in FCC Public Notice Number 20922, released December 09, 1991.

Attachment "A" to this Statement sets forth by display the five closest major cities defined in Public Notice Number 20922, with their reference coordinates and required co-channel separation distance, and actual distance in kilometers, with bearing in degrees True, from the City of Menominee, Michigan Reference Coordinates. This attachment displays a "Short-Spacing" to the City of Milwaukee, Wisconsin Reference Coordinates in contravention with current Commission allotment policy.

To allot Channel 31 to Menominee, Michigan, it is necessary to restrict the allotment location 17.78 kilometers distant, at a bearing of 00.0 degrees True, (due North), to geographic coordinates 45°-16'-45" North Latitude, 87°-40'-26" West Longitude.

Attachment "B" to this Statement evidences allotment of Television Channel 31 to Menominee, Michigan

at the proposed restricted geographic coordinates does not fall under any restrictions defined in FCC Public Notice Number 20922.

Attachment "C" to this Statement, a Television Channel 31 Distance Separation Study with proposed Menominee, Michigan restricted allotment coordinates as base, displays a "Short-Spacing" to a vacant UHF Television Channel *17+ allotment at Iron Mountain, Michigan.

In order to allot Television Channel 31 to Menominee, Michigan and Television Channel 17 to Wittenberg, Wisconsin proposed by Tri-Cities Television Company and comply with minimum distance separation requirements between stations set forth in 47 Code of Federal Regulations, §73.610, it is necessary to substitute UHF Television Channel 25 for Channel *17+ at Iron Mountain.

Attachment "D" to this Statement sets forth by display the five closest major cities defined in Public Notice Number 20922, with their reference coordinates and required co-channel separation distance and actual distance in kilometers, with bearing in degrees True, from the Reference Coordinates of the City of Iron Mountain. This attachment evidences substitution of Channel 25 for Channel *17+ at the City of Iron Mountain, Michigan Reference Coordinates does not fall under any restrictions defined in FCC Public Notice Number 20922.

The substitution of Television Channel 25 for Television Channel *17+ at Iron Mountain, Michigan is considered optimum.

Utilization of Channel 25 at Iron Mountain is precluded by the existing vacant Channel 17 allotment, for which the channel substitution is proposed. Code of Federal Regulations, §73.698, Table II displays a required 31.4 kilometer separation between a Channel 17 and Channel 25 allotment.

The substitute Channel 25 is not technically inferior to the allotted Channel *17+. The frequency separation between UHF Television Channel 17 and Channel 25 is only 42.0 megahertz, with both channels located in the lower portion of the UHF television spectrum.

Attachment "E" to this Statement, a Television Channel 25 Distance Separation Study with the City of Iron Mountain, Michigan Reference Coordinates as base.

A review of Attachment "E" evidences substitution of UHF Television channel 25 for UHF Television Channel *17+ at Iron Mountain, Michigan, in complete accord with all applicable FCC Rules and Regulations.

Attachment "F" to this Statement, a Television Channel 31 Distance Separation Study with proposed Menominee, Michigan restricted allotment coordinates as base, and substitution of Channel 25 for Channel *17+ at

Iron Mountain, Michigan, effected, displays allotment of UHF Television Channel 31 to Menominee, Michigan in complete compliance with all applicable minimum distance separation requirements set forth in 47 Code of Federal Regulations, §73.610.

Many ideal transmitter sites exist from which "Principal Community" coverage can be provided to the entire city of Menominee, Michigan.

The most distant point on the City of Menominee, Michigan Corporate Boundary ("City-Limits") from the proposed restricted Television Channel 31 allotment coordinates was located on United States Geological Survey 7.5 Minute Series (Topographic) Quadrangle Map, titled: Marinette East, Wisconsin-Michigan, (dated 1963, photorevised 1976).

The geographic coordinates determined as: 45°-05'-45" North Latitude, 87°-35'-22" West Longitude and distance and bearing calculated to be 19.07 kilometers (11.85 miles) at 174.4 degrees True.

The 80.0 dBu "Principal Community Contour" of a typical minimal Channel 31 operation radiating 500.0 kilowatts from an antenna radiation center height of 150 meters extends a distance of 31.5 kilometers.

With UHF Television Channel 25 substituted for UHF Television Channel *17+ at Iron Mountain, Michigan Channel

17 is available for allotment at Wittenberg, Wisconsin.

The Village of Wittenberg, Wisconsin geographic Reference Coordinates, specified in the National Atlas of the United States of America, published by the United States Department of the Interior Geological Survey, are:

44°-49'-24" North Latitude, 89°-10'-06" West Longitude.

Allotment of UHF Television Channel 17 to Wittenberg, Wisconsin falls under restrictions defined in FCC Public Notice Number 20922, released December 09, 1991.

Attachment "G" to this Statement sets forth by display the five closest major cities defined in Public Notice Number 20922, with their reference coordinates and required co-channel separation distance and actual distance in kilometers, with bearing in degrees True, from the Village of Wittenberg Wisconsin Reference Coordinates. This attachment displays a "Short-Spacing" to the City of Milwaukee, Wisconsin Reference Coordinates, in contravention with current Commission allotment policy.

To allot Television Channel 17 to Wittenberg, it is necessary to restrict the allotment location 28.89 kilometers distant, at a bearing of 00.0 degrees True (due North), to geographic coordinates 45°-05'-00" North Latitude, 89°-10'-06" West Longitude.

Attachment "H" to this Statement evidences allotment of Television Channel 17 to Wittenberg, Wisconsin

at the proposed restricted geographic coordinates, does not fall under any restrictions defined in FCC Public Notice Number 20922.

Attachment "H" to this Statement is a Television Channel 17 Distance Separation Study with proposed Wittenberg, Wisconsin restricted allotment coordinates as base. With the proposed Iron Mountain, Michigan channel substitution effected, the allotment of UHF Television Channel 31 to Wittenberg, Wisconsin in complete compliance with all applicable minimum distance separation requirements set forth in 47 Code of Federal Regulations, §73.610.

Many ideal transmitter sites exist from which "Principal Community" coverage can be provided to the entire village of Wittenberg, Wisconsin.

The most distant point on the Wittenberg Wisconsin Corporate Boundary ("Village Boundary") from the proposed restricted Television Channel 17 allotment coordinates was located on United States Geological Survey 7.5 Minute Series (Topographic) Quadrangle Map, titled: Wittenberg, Wisconsin (dated 1982).

The geographic coordinates determined as: 44°-49'-09" North Latitude, 89°-09'-09" West Longitude and distance and bearing calculated to be 29.36 kilometers (18.24 miles) at 178.4 degrees True.

The 80.0 dBu "Principal Community Contour" of a

typical minimal Channel 17 operation radiating 500.0 kilowatts from an antenna radiation center height of 150.0 meters extends a distance of 31.5 kilometers.

Allotment of UHF Television Channel 17 at the proposed Wittenberg, Wisconsin restricted allotment coordinates is in complete accord with Mass Media Docket 18261 and 47 Code of Federal Regulations, §74.709, Land mobile station protection.

Displayed on "Tables", part of 47 C.F.R §74.709, the nearest community of concern relative to an operation on Channel 17 is Washington D.C., 1218.96 kilometers distant, on Channel 16, South Bend, Indiana, 454.53 kilometers distant and on Channel 15, Zanesville, Ohio, 822.12 Kilometers distant. These actual distances far exceed those required.

CONCLUSION

Allotment of UHF Television Channel 31 to Menominee, Michigan and UHF Television Channel 17 to Wittenberg, Wisconsin can be accomplished with one simple channel substitution.

No multiple community "tinkering with the table" is required to allow allotment of Channel 31 at Menominee, Michigan and Channel 17 at Wittenberg, Wisconsin. Only substitution of UHF Television Channel 25 for UHF Television Channel *17+, an unapplied for vacant allotment at Iron

Mountain, Michigan.

There is no effect on any assignment, application or allotment within the "temporary freeze zone" on new allotments or applications. See Notice of Inquiry, 2 FCC Rcd 2125 (1987) and Order, 52 FR 28346, July 29, 1987.

The Tri-Cities Television Company proposed Amendment of 47 Code of Federal Regulations, §73.606(b), Table of Allotments, Television Broadcast Stations, shall provide residents of Menominee, Michigan and vicinity with a first local television transmission service, and residents of Wittenberg, Wisconsin and vicinity, a first local broadcast service and first local television transmission service.

Menominee, Michigan and vicinity residents shall be provided a first "Principal Community" (80.0 dBu), or "Grade A" (74.0 dBu) signal. Residents of the Wittenberg vicinity shall also receive a first "Principal Community" or "Grade A" signal.

The requested allotments petitioned by Tri-Cities Television Company shall provide residents of Menominee and Wittenberg with a vehicle for local visual self expression, truly in the public interest, convenience and necessity.

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Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Lyle Robert Evans", with a stylized flourish at the end.

Lyle Robert Evans
Technical Consultant to:
Tri-Cities Television Company

February 03, 1994

Lyle Robert Evans
Technical Consultant
1391 North Road
Green Bay, Wisconsin 54313
(414) 494-2626

ENGINEERING STATEMENT; CONCLUDED

TELEVISION CHANNEL 31 DISTANCE SEPARATION STUDY

LOCATION: MENOMINEE, MICHIGAN
SERVICE: COMMERCIAL TELEVISION
CHANNEL: 31
FREQUENCY: 572-578 MEGAHERTZ
ZONE: II
CLASS: FULL POWER
COORDINATES: 45°-06'-24" N.L., 87°-36'-48" W.L. (CITY REFERENCE COORDINATES)
PETITIONER: TRI-CITIES TELEVISION COMPANY
DATE: DECEMBER 24'TH, 1993

CITY STATE	CHAN ZONE	LATITUDE LONGITUDE	BEAR. (DEG.)	DIST. (KM.)	REQ. (KM.)
MILWAUKEE WI	I	43-02-19 87-54-15	185.8	230.91 -17.69	248.6 SHORT*
CHICAGO IL	I	41-52-28 87-38-22	180.3	359.03 110.43	248.6 CLEAR
SAINT PAUL MN	II	44-56-50 93-05-11	267.7	431.37 150.57	280.8 CLEAR
MINNEAPOLIS MN	II	44-58-57 93-15-43	268.2	444.91 164.11	280.8 CLEAR
DETROIT MI	I	42-19-48 83-02-57	130.0	479.82 231.22	248.6 CLEAR

----- END TV CHANNEL 31 STUDY -----

NOTE: The "Short-Spacing" to the major city defined in FCC Public Notice Number 20922, whose indicated distance separation status is followed by an asterisk (*), is alleviated by utilization of proposed restricted allotment coordinates.

ATTACHMENT A; CONCLUDED